

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

KRISTINE KEYES	:	No. 1:20-cv-02649-NLH-KMW
	:	
	:	
Plaintiff,	:	MOTION RETURN DAY:
	:	JUNE 15, 2020
v.	:	
	:	
NATIONSTAR MORTGAGE, LLC, et.al.:	:	

NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned attorney for Defendant, RAS Citron, LLC, will move before the Honorable Karen M. Williams, U.S.M.J. on June 15, 2020, for an Order dismissing Plaintiff's Complaint with Prejudice. In support of the motion, Plaintiff relies on the accompanying brief with attached exhibits, submitted therewith. Please take Notice that oral argument is requested if opposition is filed.

RAS CITRON, LLC

Date: May 13, 2020

By: /s/ David Neeren
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RAS CITRON, LLC'S MOTION TO DISMISS COMPLAINT WITH PREJUDICE

Defendant, RAS Citron, LLC ("RAS" by and through its undersigned counsel, respectfully submit this Motion to Dismiss Plaintiff's Complaint pursuant to Rules 8(a), 9(b), 12(b)(1), 12(b)(3) and 12(b)(6) pursuant to incorporation as stated in the accompanying brief.

In support of its Motion, RS relies upon the accompanying brief, with attached exhibits, submitted herewith. A proposed form of Order dismissing the Complaint as to Udren with prejudice and a Notice of Motion is included with its Motion papers.

Respectfully submitted,

RAS CITRON, LLC

Date: May 13, 2020

By: /s/ David Neeren
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Attorney for RAS

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	:	
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[PROPOSED] ORDER

AND NOW, this ____ day of _____, 2020, upon consideration of RAS Citron, LLC's Motion to Dismiss, the response thereto, if any, and all exhibits and memoranda of law filed therewith, it is hereby ORDERED and DECREED that the Motion is GRANTED. Plaintiff's Complaint is DISMISSED WITH PREJUDICE as to all Defendants.

_____, J.